

DAVID J. HARRIS, ESQUIRE
ATTORNEY FOR DEBTOR
PA S. Ct. No.: 48558
FL Bar No.: 0451207

69 Public Square, Suite 700
Wilkes-Barre, PA 18701
Telephone: (570) 823-9400
Facsimile: (570) 208-1400
E-Mail: dh@lawofficeofdavidharris.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
 : Chapter 13
DIANE C. BURKE : Case No.: 5:17-bk-04938
Debtor :

**ANSWER OF DEBTOR TO MOTION FOR
RELIEF OF M&T BANK**

The Debtor, DIANE C. BURKE, by and through her counsel, David J. Harris, Esquire, hereby answers the Motion of M&T Bank for relief from the automatic stay, as follows:

1. ADMITTED.
2. ADMITTED IN PART. DENIED IN PART. By way of further answer, the undersigned represents only the Debtor, Diane C. Burke.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. DENIED. Strict proof thereof is demanded for trial. By way of further answer, the undersigned represents only the debtor.
7. DENIED. Strict proof thereof is demanded for trial.
8. DENIED. It is denied that Movant is entitled to any such reimbursement.

9. DENIED. Movant's averment requires no response and therefore such averment is denied.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

AFFIRMATIVE DEFENSES

10. Debtor hereby incorporates by reference her answers in Paragraphs 1 through 9 above as if made a part hereof.

11. There is sufficient equity in the subject property.

12. Movant is adequately protected.

13. The subject property is necessary to the Debtor for an effective reorganization.

14. There is no cause for granting the relief sought by Movant in its Motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: September 18, 2018
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE